

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ISABEL RUBINAS, and
IJR CORP.,

Plaintiffs,

V.

NICOLAS MADUROS, DIRECTOR,
CALIFORNIA DEPARTMENT OF
TAX & FEE ADMINISTRATION,

Defendant.

Case No. 1:21-cv-00096

Hon. Edmond E. Chang

**PLAINTIFFS' MOTION FOR A TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs Isabel Rubinas and IJR Corp. (“Ms. Rubinas”) respectfully request that the Court enter a temporary restraining order and preliminary injunction prohibiting Defendant Nicolas Maduros, Director, California Department of Tax & Fee Administration, from further violating Ms. Rubinas’s civil rights during the pendency of this litigation. The reasons for that relief are set forth in the attached memorandum.

Counsel for Ms. Rubinas has advised counsel for Defendant of this motion, which Defendant opposes. Counsel for Ms. Rubinas provided an electronic copy of the Complaint to Defendant, who accepted service, and to Defendants' counsel. Counsel for Ms. Rubinas will also serve Defendant and his counsel with these moving papers.

Ms. Rubinas respectfully requests a remote hearing at the Court's earliest convenience given the exigent nature of the issues. Discovery is not necessary prior to such a hearing because the operative facts presented in the attached memorandum are known to both sides. (Ms. Rubinas

reserves the right to seek targeted discovery depending on Defendant's arguments and insofar as the timetable permits.)

Respectfully submitted this 8th day of January, 2021.

s/ Paul K. Vickrey

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